

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:	:	CHAPTER 13
NICOLE MAUREEN VANCE	:	
Debtor	:	CASE NO. 1:19-bk-04995
JPMORGAN CHASE BANK, NA	:	
Movant	:	
vs.	:	
NICOLE MAUREEN VANCE	:	
Respondent	:	
	:	

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.
7. Admitted. Debtor was out of work due to a medical procedure but intends to cure the arrearages within a reasonable time with her tax refund.
8. Admitted.
9. Denied. See response to paragraph 7. Further, Movant is protected by an equity cushion of at least \$30,000.00.
10. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.
11. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

/s/ Kara K. Gendron

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